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14 *Consumer Products, LLC, Toshiba America*  
15 *Information Systems, Inc., and Toshiba*  
16 *America Electronic Components, Inc.*

17 UNITED STATES DISTRICT COURT  
18 NORTHERN DISTRICT OF CALIFORNIA  
19 (SAN FRANCISCO DIVISION)

20 IN RE: CATHODE RAY TUBE (CRT)  
21 ANTITRUST LITIGATION

22 Case No. 07-5944 SC  
23 MDL No. 1917

24 This Document Relates to:

25 *Best Buy Co., Inc., et al. v. Hitachi, Ltd., et*  
26 *al., No. 11-cv-05513;*

27 *CompuCom Systems, Inc. v. Hitachi, Ltd. et*  
28 *al., No. 11-cv-06396;*

*Costco Wholesale Corporation v. Hitachi,*  
*Ltd., et al., No. 11-cv-06397;*

*Electrograph Systems, Inc. et al. v. Hitachi,*  
*Ltd. et al., No. 11-cv-01656;*

*Interbond Corporation of America v. Hitachi,*  
*et al., No. 11-cv-06275;*

**DECLARATION OF DANA E.  
FOSTER IN SUPPORT OF  
TOSHIBA'S OBJECTIONS TO  
SPECIAL MASTER'S  
RECOMMENDED ORDER  
DATED AUGUST 6, 2015 RE  
DIRECT ACTION PLAINTIFFS'  
MOTION TO COMPEL TOSHIBA  
TO AUTHENTICATE  
DOCUMENTS**

DECLARATION OF DANA E. FOSTER IN SUPPORT OF TOSHIBA'S OBJECTIONS TO  
SPECIAL MASTER'S RECOMMENDED ORDER DATED AUGUST 6, 2015 RE DIRECT  
ACTION PLAINTIFFS' MOTION TO COMPEL TOSHIBA TO AUTHENTICATE DOCUMENTS  
Case No. 07-5944-SC, MDL No. 1917

White & Case LLP  
701 Thirteenth Street, NW  
Washington, DC 20005

1 *Office Depot, Inc. v. Hitachi, Ltd., et al.*,  
2 No.11-cv-06276;  
3 *P.C. Richard & Son Long Island*  
4 *Corporation, et al. v. Hitachi, Ltd., et al.*, No.  
5 12-cv-02648;  
6 *Schultze Agency Services, LLC v. Hitachi,*  
7 *Ltd., et al.*, No. 12-cv-02649;  
8 *Sharp Electronics Corp., et al. v. Hitachi Ltd.,*  
9 *et al.*, No. 13-cv-01173; and  
10 *Tech Data Corporation, et al. v. Hitachi, Ltd.,*  
11 *et al.*, No. 13-cv-00157.

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DECLARATION OF DANA E. FOSTER IN SUPPORT OF TOSHIBA'S OBJECTIONS TO  
SPECIAL MASTER'S RECOMMENDED ORDER DATED AUGUST 6, 2015 RE DIRECT  
ACTION PLAINTIFFS' MOTION TO COMPEL TOSHIBA TO AUTHENTICATE DOCUMENTS  
Case No. 07-5944-SC, MDL No. 1917

1 I, Dana E. Foster, hereby declare as follows:

2 1. I am an attorney with the law firm of White & Case LLP, counsel for  
3 Defendants Toshiba Corporation, Toshiba America, Inc., Toshiba America Consumer  
4 Products, L.L.C., Toshiba America Information Systems, Inc., and Toshiba America  
5 Electronic Components, Inc. (collectively, the "Toshiba Defendants").

6 2. I submit this declaration in support of Toshiba's Objections to Special  
7 Master's Recommended Order Dated August 6, 2015 Re Direct Action Plaintiffs' Motion to  
8 Compel Toshiba to Authenticate Documents, filed contemporaneously herewith. I have  
9 personal knowledge of the facts stated herein, and I could and would competently testify  
10 thereto if called as a witness.

11 3. Attached hereto as **Exhibit A** is a true and correct copy of the IPPs and DAPs'  
12 Motion to Compel Toshiba Defendants to Authenticate Documents, dated October 29, 2014  
13 ("Plaintiffs' Motion to Compel").

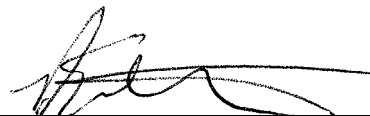
14 4. Attached hereto as **Exhibit B** is a true and correct copy of the Toshiba  
15 Defendants' Response to the Plaintiffs' Motion to Compel, dated November 14, 2014.

16 5. Attached hereto as **Exhibit C** is a true and correct copy of the IPPs and DAPs'  
17 Reply in Support of the Plaintiffs' Motion to Compel, dated November 21, 2014.

18 6. Attached hereto as **Exhibit D** is a true and correct copy of the Order re Direct  
19 Action Plaintiffs' Motion to Compel Toshiba to Authenticate Documents, dated  
20 August 6, 2015.

21 I declare under penalty of perjury under the laws of the United States of America that  
22 the foregoing is true and correct.

23  
24 Executed this 20<sup>th</sup> day of August, 2015, in Washington, D.C.

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28 Dana E. Foster